

Dear Diane and Valerie:

Good Afternoon

Thank you for making the request to have a copy of my personal (vocal) presentation last week at the NOSB public meeting.

I begin by reintroducing myself.

I hold a B.S. degree in Marine Sciences/Biology (Long Island University, Southampton 1978).

I have been involved in the aquaculture industry (in commerce, consulting and management), since 1979 and have worked with aquaculture companies on 4 continents in 11 countries over that time frame.

I currently own Martin International Corporation, an import/export company that I founded in 1985

I paraphrase my comments to the NOSB and NOP as follows:

"We support and encourage the acceptance of the Interim Final Report as the basis for a Final Rule that contains modifications and adaptations which conform to The Organic Food Production Act; that specifically addresses the biological requirements of aquatic species.

As OFPA was written for terrestrial livestock, the differences between terrestrial livestock farming and aquaculture are obvious but not necessarily insurmountable. In my opinion the main areas of concern lie in two groups."

1). Within The Organic Food Production Act, under #6506 (General Requirements) #11/A; "in the case of farm or field, the area to be certified has distinct boundaries and buffer zones separating the land being operated through the use of organic methods from land that is not being operated through the use of such methods".

Response: "A fence limits the movement of terrestrial livestock and a net limits the movement of aquatic species. A buffer zone (distance and up-hill, down-hill physical positioning) is created for terrestrial livestock. A buffer zone can also be created in the sea considering (distance), tides and current. The aspect that seems to present (popular) disagreement concerns the degree of control the terrestrial system (apparently) has that (some) feel is not possible in the open sea. This misconception is one in which the pundits fail to acknowledge that the terrestrial system does not allow considerably more control over all input than the aquatic system. The fallacy (of more control on the terrestrial model) is apparent when one realizes that the terrestrial system has only so much control over input into the land insofar as one can restrict or manage rain and/or air pollution. Similarly the aquatic system has only limited control over input into the sea (considering the proximity to agricultural runoff and industry or shore side residential development)."

"Neither terrestrial organisms nor aquatic species absorb any significant environmental contamination directly from the sea or the atmosphere/rain. They do ingest most if not all of the environmental contaminants from their feed and the terrestrial organism can be directly influenced by the environment (i.e. rain falling for the sky containing environmental contaminants; contaminates the feed (grass) directly whereas environmental contaminants within seawater do not directly contaminate the pelagic fish (it is indirect via plankton and algae) that ultimately become the feed in the aquatic system). The aquatic system actually presents greater opportunity for control over input than the terrestrial system in that regard."

"Aquatic species in open net pen systems are raised with the intent to provide a system in

which species are able to exhibit as natural behavior as possible within the limits of an aquatic system in the sea. The established EU organic rules provide for systems that maintain densities and environmental conditions that are as close to those found in nature as possible."

2). The other consideration falls under item # 6509 (Animal Production Practices and Materials) C (practices) # 1; "shall feed such livestock organically produced feed that meets the requirements of this chapter".

Response: "Aquatic species have specific nutritional requirements that must be addressed and allowed to the extent as to be in compliance with OFPA. As the Interim Final Report suggests two possibilities (option A & B), I would offer that a modification of Option A is the only viable option from a practical and market acceptance standpoint. Certification of wild fish for the explicit use as the basis for organic feed production and not for use as food for direct consumption by humans could be developed in a manner that addresses production within (safe biological limits), monitors and limits PBT's and adheres to a re-cycling model within a 5 year sunset provision during which the allowance may be reviewed and adapted for this use".

"Option A should not be limited to the certification of wild fish per se. In the terrestrial model, the pasture is certified (not the grass) and the beef steer graze upon wild grass growing in a certified pasture. Any wild fish used as the protein basis for fish meal production should not (itself) be certified, but the (production process) by which the final feed is produced is the certifiable entity. The organic part is the process by which wild fish which meet the established criteria for organic certification and are only a single component of the (ultimately) certified feed (as wild grass is to the organic beef steer)."

"Option B is self-defeating from two standpoints. First, feeding a carnivorous organic fish a diet that is vegetable based (with added synthetic amino acid supplements) will not yield the same nutritional value (in the final product) to the consumer in terms of omega-3 fatty acid content. This is also a very unnatural model and one the consumer would reject on that basis. Secondly the fish consuming a diet that is primarily vegetable-based will not convert that protein efficiently and will become a "waste-producing machine". If the fish does not convert vegetable protein efficiently, it simply passes the unassimilated bulk which in turn exacerbates the consideration to limit environmental impact to the greatest extent possible."

Finally I would like to point out that as the Marine Stewardship Council (MSC) has become the popular benchmark for "certified sustainable", they have never (to date) worked within the realm of fisheries used in commercial fish meal production. When George Lockwood mentioned that the only fishy presently certified by MSC that would apply to (option A) was the Alaskan Pollock fishery, he was correct, but that fishery is certified for direct human consumption and the model should not be transposed onto fisheries destined for fishmeal production (partly because the stocks are under different types of "pressure" from indirect use as human food). MSC simply is not the best suited (as they operate today) to be the sole arbiter for that sector and a human food source should not be considered a model for a fishery generating protein in the form of fishmeal.

If you require any clarification and/or additional comment, please advise and I would be pleased to contribute.

Sincerely,
Dick Martin